

the rotation mechanism is supported by a movement mechanism for effecting movement in the front/back direction of the injection molding machine.--

REMARKS

Applicants thank the Examiner for the thorough consideration given the present application. Claims 1-7 and 9-13 are pending in this application. Claims 1, 9, and 13 are independent. Claim 8 is canceled. Claims 9-13 are added. Reconsideration of this application, as amended, is respectfully requested.

Drawings

Applicants have not received a Notice of Draftsperson's Patent Drawing Review, Form PTO-948, indicating whether the formal drawings filed with the application have been approved by the Official Draftsperson. It is respectfully submitted that the drawings comply with the requirements of the USPTO. Clarification with the next official communication is respectfully requested.

Acknowledgment of Information Disclosure Statement

The Examiner has acknowledged receipt of the Information Disclosure Statement filed January 4, 2001, and returned an initial copy of the Form PTO-1449. No further action is necessary at this time.

Rejections Under 35 U.S.C. §103(a)

Claims 1-3 and 5 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,105,454 to Bacchi et al. in view of U.S. Patent No. 6,386,859 to Hehl. Claim 4 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Bacchi et al. in view of Hehl, and further in view of U.S. Patent No. 5,860,331 to Hashimoto et al. Claims 7 and 8 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Bacchi et al. in view of Hehl, and further in view of U.S. Patent No. 3,947,208 to Broderick. These rejections are respectfully traversed.

While not conceding the appropriateness of the rejections, but merely to advance prosecution, added claim 9 corresponds to original claim 1 but additionally incorporates the limitations of claims 4 and 5. Added claims 10, 11, and 12 correspond to original claims 2, 3, and 6, respectively, while added claim 13 corresponds to original claim 1 but additionally incorporates the limitations of claims 7 and 8. Claim 8 is canceled.

It is respectfully submitted that the instantly amended claims patentably distinguish over the art cited by the Examiner, including Bacchi et al.

Bacchi et al. is directed to a continuously rotatable, multiple link robot arm system employing a triaxial drive motor configuration. Hehl is directed to an extractor for injection-molding machine for processing plastifiable compounds.

On page 4 of the Office Action, the Examiner states that "[it] would have been obvious to one of ordinary skill in the art to modify Bacchi by incorporating the robot arm into the injection molding machine as taught by Hehl for article removal because it provides

an improved articulated article extractor.” To justify a prior art rejection under 35 U.S.C. §103(a), there must be some motivation in the references themselves to combine them. “The patent examination process centers on prior art and the analysis thereof. When patentability turns on the question of obviousness, the search for an analysis of the prior art includes evidence relative to the finding of whether there is a teaching, motivation or suggestion to select and combine the reference relied on as evidence of obviousness” (citations omitted). *In re Sang-Su Lee*, 277 F.3d 1342, 1343.

Although the Examiner may assert that the claimed invention is obvious, the Examiner has failed to produce the requisite evidence to support his assertions. There is no teaching, motivation or suggestion to combine the robot arm system in Bacchi et al. with the injection-molding machine in Hehl to achieve Applicants’ claimed invention. It would take a Herculean effort to find motivation to combine references as disparate as Bacchi et al. and Hehl, which relate to completely different subject matters.

Assuming, *arguendo*, that the references were properly combinable, which they are not, neither Bacchi et al. nor Hehl discloses the presently claimed subject matter, which includes a combination of elements in a robot for a production machine including a chuck fixed to the distal side shaft that is rotatably supported on a distal end portion of the second arm. M.P.E.P. §2144.03 states that to establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 U.S.P.Q. 580 (C.C.P.A. 1974). Further, for a proper rejection under 35 U.S.C. § 103(a), “the references must be viewed without the benefit of impermissible

hindsight vision afforded by the claimed invention.” *See* M.P.E.P. § 2141. Accordingly, since the claims recite a feature not taught or suggested by any of the applied prior art references, Applicants respectfully request that the rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn.

In rejecting claim 4, the Office Action relies upon Hashimoto et al. for teachings of ratios of the distances between center points of pulley portions. Claim 4 depends from and thus incorporates all the features of claim 1, including the above-cited feature of claim 1. However, nowhere does Hashimoto et al. teach or suggest this feature of claim 1, incorporated in claim 4. Accordingly, Applicants respectfully assert that the rejection of claim 4 under 35 U.S.C. §103(a) should be withdrawn at least because the combination of Bacchi et al., Hehl and Hashimoto et al. neither teaches nor suggests the above cited feature of claim 1, incorporated in claim 4.

In rejecting claims 7 and 8, the Office Action relies upon Broderick for teachings of specific features of the support structure of a robot arm. Claims 7 and 8 depends from and thus incorporate all the features of claim 1, including the above-cited feature of claim 1. However, nowhere does Broderick teach or suggest this feature of claim 1, incorporated in claims 7 and 8. Accordingly, Applicants respectfully assert that the rejections of claims 7 and 8 under 35 U.S.C. §103(a) should be withdrawn at least because the combination of Bacchi et al., Hehl and Broderick neither teaches nor suggests the above cited feature of claim 1, incorporated in claims 7 and 8.

With regard to dependent claims 2, 3 and 5, Applicants submit that claims 2, 3 and 5 depend from independent claim 1, which is allowable for the reasons set forth above, and therefore claims 2, 3 and 5 are allowable based on their dependence from claim 1. Reconsideration and allowance thereof are respectfully requested.

Conclusion

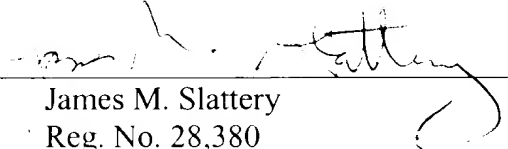
All the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants, therefore, respectfully request that the Examiner reconsider the presently outstanding rejection and that it be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and that the present application is in condition for allowance.

If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Sam Bhattacharya, Reg. No. 48,107, at 703-205-8000.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for

any additional fees required under 37 C.F.R. §§ 1.16 or 1.17, particularly extension of time fees.

Respectfully submitted,
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